



September 17, 2014

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: In the Matter of Applications of Comcast Corp., Time Warner Cable Inc.,
Charter Communications, Inc., and SpinCo; For Consent to Assign or
Transfer Control of Licenses and Authorizations; GN Docket No. 14-57

Dear Ms. Dortch,

On behalf of Asian Americans Advancing Justice | AAJC, we submit the following comments regarding the proposed transaction between Comcast and Time Warner Cable. In the Commission's review of whether this proposed transaction serves the public interest we provide the following information regarding Comcast's efforts to increase diversity and inclusion in its practices.

Advancing Justice | AAJC is dedicated to promoting a fair and equitable society for all by working for civil and human rights and empowering Asian Americans and other underserved communities. We provide the growing Asian American community with multilingual resources, culturally appropriate community education, and public policy and civil rights advocacy. In the communications field, Advancing Justice | AAJC works to promote universal access and reduce barriers to critical technology, services, and the media.

In 2010, as part of the Comcast/NBCU merger, Advancing Justice | AAJC joined several national Asian American organizations to negotiate a historic Memorandum of Understanding (MOU) to ensure the merger enhanced diversity at Comcast/NBCU.¹ Under the MOU Comcast/NBCU committed to increasing and improving its diversity and inclusion practices in the following areas:

- Corporate governance;
- Employment/workforce recruitment;
- Procurement;

¹ Press Release, Asian American Justice Center, Comcast/NBCU Reach Historic Agreement with Asian American Media and Civil Rights Groups (Dec. 15, 2010), <http://oldwww.advancingequality.org/news-releases/comcastnbcu-reach-historic-agreement-with-asian-american-media-and-civil-rights-groups>.

- Programming; and
- Philanthropy.²

We now report to the Commission that Comcast/NBCU has delivered on the commitments it made in the MOU. As outlined in the MOU, Comcast established and has relied upon its Asian American Advisory Council, on which Advancing Justice| AAJC is represented, to develop, meet, and increase its diversity and inclusion initiatives.

A constant concern in the Asian American community is the lack of culturally and linguistically relevant content.³ Comcast/NBCU has made substantial progress to address this concern. Comcast's programming has continued to expand Asian American-focused content such as the distribution of Crossings TV, Mnet, and Myx TV networks.⁴ Comcast also launched Cinema Asian America⁵ on its video on demand platform and the Xfinity Asia microsite on its website.⁶ Most recently we were pleased to see that NBC News launched an online news portal that specifically focuses on our communities.⁷

Advancing Justice | AAJC and Comcast have also worked together to increase broadband adoption through Comcast-supported programs like Digital Connectors and Internet Essentials. Comcast has committed to launch the Internet Essentials program in Time Warner Cable markets if the transaction is approved.⁸ Time Warner Cable markets include Los Angeles, New York City, and Hawaii, which have some of the largest Asian American and Pacific Islander communities.⁹

Comcast has committed to bring its diversity and inclusion initiatives to Time Warner Cable and we understand that Comcast/NBCU has committed to reevaluate and expand

² Memorandum of Understanding between Comcast Corporation, NBC Universal and The Asian American Leadership Organizations ¶3 available at

http://www.advancingequality.org/sites/aaajc/files/Asian%20American%20MOU%20pdf%281%29_0.pdf.

³ The highest rated mainstream television shows among Asian Americans are shows that have Asian American actors, which indicates a strong desire among Asian Americans to see people who resemble them. Nielsen, *State of the Asian American Consumer: Growing Market, Growing Impact*, 11 (2012), <http://www.nielsen.com/content/dam/corporate/us/en/microsites/publicaffairs/StateoftheAsianAmericanConsumerReport.pdf> (hereinafter *State of the Asian American Consumer*).

⁴ Comcast/NBCUniversal, *Seeing the Bigger Picture* 31 (2014), http://corporate.comcast.com/images/Comcast_Diversity_Report_060214.pdf.

⁵ Angry Asian Man, *Comcast Launches Cinema Asian America on Demand*, Dec. 1, 2010, <http://blog.angryasianman.com/2010/12/comcast-launches-cinema-asian-america.html>.

⁶ See <http://xfinitytv.comcast.net/microsite/asian-american>.

⁷ See <http://www.nbcnews.com/news/asian-america>.

⁸ See Alina Selyuk & Liana B. Baker, Comcast Expands Low-Income Internet Service as Merger Review Nears, REUTERS, Mar. 4, 2014, <http://www.reuters.com/article/2014/03/04/us-usa-comcast-internet-idUSBREA231WS20140304>. The Internet Essentials program currently serves only households with at least one child who is eligible to participate in the National School Lunch Program. Comcast, How it Works, <https://www.internetessentials.com/how-it-works> (accessed Aug. 27, 2014).

⁹ U.S. Census Bureau, *The Asian Population: 2010* 11, Table 3 (2010), <http://www.census.gov/prod/cen2010/briefs/c2010br-11.pdf>. When ranked by total Asian population, New York City, Los Angeles, and Honolulu are ranked first, second, and seventh, respectively.



its diversity and inclusion goals. We urge the Commission to consider and ensure the importance of diversity and inclusion as it reviews this transaction.

Although all companies should take diversity and inclusion as seriously as Comcast/NBCU, the Commission must still thoroughly review the proposed transaction to determine whether it benefits the public interest. If you have any questions or would like to discuss further our comments, please contact Asian Americans Advancing Justice | AAJC senior staff attorney Jason T. Lagria at jlagra@advancingequality.org or 202-296-2300 ext 122.

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